

Benham, Katherine

From: george.simon@organicvalley.com%inter2 [george.simon@organicvalley.com] on behalf of george.simon@organicvalley.com
Sent: Tuesday, June 14, 2005 12:31 PM
To: Neal, Arthur; Benham, Katherine; Jones, Keith; rigobertodelgado@sbcglobal.net%inter2; de.carter@comcast.net%inter2; penndutch@earthlink.net%inter2; jriddle@luminet.net%inter2; mlacy@arches.uga.edu%inter2; nxo3@psu.edu%inter2
Subject: NODPA comments
Attachments: ATTACHMENT.TXT

Here are some additional pasture comments that were not posted. G

To: National Organic Standards Board
c/o Arthur Neil
Room 4008--South Building
1400 Independence Avenue--SW
Washington, DC, 20250-0001

From: Northeast Organic Dairy Producers Alliance

Re: Support of the NOSB's draft pasture guidance document

Date: May 19, 2005

Dear NOSB Members,

The Northeast Organic Dairy Producers Alliance (NODPA) is an organization representing organic dairy producers, with currently well over 300 organic dairy producers as paid members. NODPA was formed in 2001.

NODPA is gratified that the NOSB endorsed pasture Rule changes at the last meeting and added numerical minimum grazing benchmarks to the draft guidance document. We thank you. NODPA fully supports the wording "Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days.* The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system."

Numerical pasture intake and seasonal length minimums have been shown necessary by the experience of the last few years since the NOP was implemented. The Rule clearly stipulates pasture as a necessary component of an organic ruminant's living conditions, health care practice, and feed supply, yet some certified organic operations and their certifiers have been ignoring those regulations when it comes to providing pasture for lactating cows. Further, the Rule Preamble states that "The NOSB specified that the stage of an animal's production is not intended to include the lactation cycle of dairy animals in which only dry cows would be allowed access to the outside and pasture." Thus, the intent of the Rule was spelled out in the Preamble--there is no mistaking what was meant, yet that intent has been and is being ignored by some. Therefore, it has been plainly demonstrated that explicit, numerical minimum pasture benchmarks must be spelled out to prevent the continuance of drylotting / confinement feeding of organic cows during the growing season.

While NODPA agrees that the farm plan pasture details specified by the guidance document are important, we want to point out that requiring a detailed farm plan in regards to pasture will not ensure that significant pasture intake will be achieved or even planned. All it ensures is that whatever the pasture plan or lack thereof, it will be detailed in the farm

7/13/2005

plan. Therefore, again, minimum benchmarks are necessary to ensure that ruminants are truly grazed.

NODPA strongly recommends reinserting the statement that was in the first draft of the pasture guidance document and in the 2001 NOSB Recommendation--that "grazed feed must provide a significant portion of the total feed requirements." This statement provides the groundwork for the "goal":

A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days....*

Concern has been expressed by some that, with these minimum parameters, drought or other natural disaster could cause farms to drop below the minimums and therefore bring the risk of decertification. Because the guidance document states that this is a "goal", it provides room for variance for extreme circumstance. However, it does mean that livestock farms must be set up with an appropriate number of animals to pasture acres such that in all years, except for years of significantly abnormal weather or extreme circumstance, the farm can at least meet these minimums. Any properly managed livestock farm will have a setup that allows flexibility for varying weather conditions from year to year and the resultant variation in yield, and will not be thrown into a deficit feed or pasture situation because of a minor change in productivity. If minor changes in productivity throw a farm under the minimums, then the farm plan is not adequate and must be revised. Major changes in productivity brought on by significantly abnormal weather will only happen rarely, and again, the guidance document wording of "goal" will allow the flexibility needed to deal with such extreme situations.

While NODPA understands the basis for the inclusion of the Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing Code 528, we do have some concerns: 1) that Code 528 is a very general document, 2) that more specific NRCS documents such as Specification Guides do not seem to be universally available for all counties, 3) that it is not easy, without initial help, to find the relevant NRCS documents on their website and along with that, the fact that many producers do not have internet access, 4) that implementation of NRCS grazing standards are customized according to production goals set by the farmer for his/her operation so it must not be construed that an NRCS plan can override the minimum pasture benchmarks. If the NRCS Standards can indeed provide guidance for appropriate ecological care of pasture regionally, can provide regionally appropriate stocking limits, and can work in concert with not only meeting the minimum benchmarks but in maximizing pasture intake, we are supportive of their use.

NODPA does have the concern as to whether a guidance document that cannot be enforced by the USDA will be adequate to address the current pasture standard abuse. We ask that the NOSB consider endorsing this guidance document as an addition to the regulation. If the NOSB is not ready to consider this, then the NOSB should annually assess if certifiers and organic dairy operations are indeed following the guidance document. If there continue to be operations not meeting the guidance document in providing significant pasture intake, then adding the guidance document language to the regulation, where USDA will have enforcement ability, must be considered.

NODPA applauds the NOSB for putting the numerical pasture minimums in this draft guidance document. Significant pasture intake by organic ruminants is a "best management" practice from many perspectives—for animal health, for soil health, for reducing the use of fossil fuels, for the best nutritive composition of organic milk and meat. Just as the organic standards were out ahead of the BSE issue, so too do the organic standards need to be out ahead in ensuring significant pasture intake.

The consumers of organic products must also be considered in this decision. It is evident by looking at all the organic milk cartons that processors know what consumers want and expect—no cartons of organic milk show cows in feedlot / confinement settings—they all feature cows on pasture. That is what organic consumers want, expect, and deserve.

Respectfully submitted,

13/2005

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